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ABSTRACT

Barriers to college attendance for the low income individual that are created by contradictory public assistance and college opportunity policies and practices are discussed, and short- and long-range recommendations to eliminate these barriers are suggested. Policies that create financial hardships for low income students are noted for the Aid to Families with Dependent Children (AFDC) program. Short-range recommendations to eliminate these penalties to AFDC recipients are offered, along with additional recommendations for the following programs: Medicaid, food stamps, unemployment insurance, and public housing. Long-range recommendations that require a fundamental restructuring of federal public assistance policies are also offered. It is proposed that reform is required to eliminate the barriers to self-sufficiency encompassed in current welfare policies. Five concerns are addressed in the recommendations: adequate financial resources for both subsistence and college attendance expenses, freedom from workfare requirements (earning benefits), information about the availability of public assistance, administrative simplicity, and support services to help low income citizens while the programs continue to be very complicated. (SW)

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RESOLVING THE CONTRADICTIONS OF FEDERAL PUBLIC ASSISTANCE AND COLLEGE OPPORTUNITY POLICIES:

LEGISLATIVE RECOMMENDATIONS

DAVID PAUL ROSEN

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Presented to:

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INTRODUCTION

Contradictory public assistance and college opportunity policies and practices represent serious barriers to a college education for the poor. Public assistance clients depend upon their benefits to assure financial access to college. While benefit checks are hardly adequate to pay the cost of college, they do provide subsistence level support for the necessities of food, shelter and clothing, allowing the poor to pay for college costs through available student aid.

Going to college costs money. Not only must tuition and fees be paid, but books, supplies, equipment, transportation, meals, clothing, health care, child care are all expenses incurred in the process of attending college. For low income citizens, both heads of households and their dependents, these expenses cannot be paid for from family resources. Subsistence costs take precedence simply as a matter of survival: rent, food, clothing, utilities, health care. The 23 million Americans living below the poverty line (National Urban League, 1974) do not have sufficient funds to pay even these subsistence costs. College for them remains an unattainable goal.

Consequently, complementary public assistance and college opportunity policies should provide adequate financial resources to low income individuals for <u>both</u> subsistence expenses <u>and</u> expenses for attendance at a college of choice. Public assistance policy which in any way reduces financial

resources available to such citizens upon their enrollment in college makes it financially almost impossible to attend. A $100 net increase in the cost of college is accompanied by a 1 percent to 3 percent decline in enrollment rates of low and moderate income individuals, with low income students harder hit (Jackson and Weathersby, 1975; Jackson, 1977; McPherson, 1978; Feldman and Hoenack, 1969; Radner and Miller, 1970; Sloan, 1971; Spies, 1973).

These problems are briefly reviewed in the discussion below. The following short term recommendations will help alleviate the financial hardships experienced by public assistance recipients in their efforts to attend college. They are intended to ease the contradictions created by the interaction of public assistance and college opportunity policies, without fundamentally changing the structure of the programs in question. Following this section, long range recommendations are presented which are designed to eliminate such contradictory policies. These recommendations require a fundamental restructuring of federal public assistance policies. While these latter recommendations may be outside the jurisdiction of the Commission, they will require action if contradictory public assistance and college opportunity policies are to be eliminated.

I. SHORT RANGE RECOMMENDATIONS

A. The Contradictions of Public Assistance and College Opportunity Policies: Background and Literature Review.

With the enactment of the Basic Educational Opportunity Grant program in the 1972 Education Amendments (Public Law 92-318), the federal government began a commitment to assuring low income citizens financial access to postsecondary education opportunities. Renamed Pell Grants -- after Senator Claiborne Pell (D., R.I.), chairman of the Senate Education Subcommittee and BEOG sponsor -- Basic Grants grew during the seventies, along with the campus-based student financial aid programs, loan and state student incentive grant programs. (These are: Supplemental Educational Opportunity Grants, National Direct Student Loans, College Work/Study grants, the State Student Incentive Grant Program, and the Guaranteed Student Loan Program.) More than $35 billion was spent through the Higher Education Amendments between 1972 and 1980, largely on student aid. (Source: Annual Evaluation Report, Volume II, Fiscal Year 1981, U.S. Department of Education, Office of Planning, Budget and Evaluation.) Even with expanded eligibility in these programs for middle income students and their families, the federal commitment to assuring financial access to some form of postsecondary education remained primarily targeted on low income students. College was established as a right for all, not for those who can afford it.

The wide variety of federal public assistance programs have no such coherent purpose. Aid to Families with Dependent

Children (AFDC) (Title IV, Part A, Social Security Act), and Food Stamps (Food Stamp Act of 1980) are income transfer programs intended to provide the poor with a modicum of financial subsistence. Medicaid (Title XIX of the Social Security Act) and public housing (Housing and Community Development Act of 1974; P.L. 93-383) provide income transfer payments of another sort, in the form of subsidies for health care and shelter. Unemployment Insurance (Title III of the Social Security Act; Federal Unemployment Tax Act) provides cash payments on premiums paid by workers when they experience involuntary unemployment. A host of employment and training programs, culminating most recently in the Comprehensive Employment and Training Act (CETA), and now replaced by the Job Training Partnership Act of 1982 (Conference Report 97-889), provide alternate forms of income maintenance to low income, unemployed citizens, subsidizing wages, training stipends and activities. Vocational rehabilitation programs (Rehabilitation Act of 1973) provide education, training, medical and rehabilitative services to disabled citizens. And Social Security provides disability insurance payments to those unable to work, as well as benefits to the children of deceased, retired or disabled parents (Old Age, Survivors and Disability Insurance Program, Social Security Act).

Each of these programs has different eligibility criteria, different standards for determining financial need, different methods and levels of payment or service delivery, and different federal-state administrative partnerships and

agencies. There exists no federal or state mechanism to assure coordination of benefits, to avoid duplication or to prevent under-awards. Furthermore, the integration of public assistance programs with student financial aid often contradicts the federal commitment to assuring the poor financial access to college.

The Congress, successive state and presidential administrations have repeatedly called for lessening the reliance of the poor on public assistance programs by developing their capacity for such economic self-sufficiency. And while it would seem a natural strategy to ally public assistance with postsecondary education opportunities, no such coherent state or federal policy has yet emerged. On the contrary, conflicting purposes and procedures of public assistance programs produce disincentives for the poor who seek to achieve self-sufficiency through education. Such disincentives frustrate the efforts of low income citizens to achieve productive careers. They perpetuate dependence on public assistance payments. They result in increased government spending on entitlement programs, while simultaneously depriving citizens of an earned income, and government of increased tax revenue. Barriers to college enrollment created by these disincentives penalize the poor by either reducing or categorically eliminating benefits upon college enrollment.

The Omnibus Budget Reconciliation Act of 1981 (OBRA) (P.L. 97-35) contains numerous provisions, hastily agreed to, with

limitations for low income citizens who are both financially dependent on public assistance programs and who seek to become self-sufficient through a college education. These provisions amount to a wave of sweeping changes which are likely to severely restrict access to higher education for the poor. They exacerbate a previously existing problem. Several examples of such provisions are described below as they affect college students and prospective college students.

AFDC

> OBRA eliminates federal support for dependent, 18-21 year old AFDC recipients. 193,000 AFDC dependents were enrolled in school in 1979. Dependents and their families may lose as much as $1,764 per year (losses will average $1,195 per year) as a result of this provision alone. (Source: Office of Research and Statistics, Social Security Administration, November, 1981).
>
> OBRA requires that parents with children under six be home except for only "very brief and infrequent absences." They are otherwise required to register for work. Such a provision will preclude many welfare parents, largely single mothers, from attending college. HEW reported that in 1977, 112,000 AFDC mothers were attending school or job training, 93,000 in 1979. (Source: Office of Research, SSA, HEW).
>
> OBRA creates a number of work disincentives, lowering work-related expense and child-care deductions, capping maximum income eligibility, and placing a four-month limit on the "30 and a third" formula for deducting earnings from grant calculation. The National Opinion Research Center of the University of Chicago found that the "working poor" are hard-hit by these provisions, and that many recipients and non-recipients who formally worked will be better off quitting their jobs for welfare. (Joe, 1982)

Social Security Student Benefits (OASDI Student:)

OBRA phases out the OASDI program over the next four years, eliminating $2 billion in student aid. The Social Security Administration reported that in March, 1981, 879,880 dependent children of deceased, retired or disabled parents received $199.0 million in student aid, an annualized total of $2.288 billion. No additional student aid has been appropriated by either the state legislature or the Congress to replace this amount. These 18-22 year olds received average monthly benefits of $256, or $3,072 per year. Significantly, 64% of OASDI recipients worked in addition to attending college. (Source: SSA.)

Medicaid

Combined state and federal cuts in the Medicaid program raise serious questions about the continued coverage of many indigent citizens. For example, the Center for the Study of Social Policy reports that California lost $385.5 million in federal Medicaid assistance from OBRA changes alone. The California Policy Seminar is currently studying the effects of the Medical reforms enacted by the state legislature last summer. The effects on medically needy students is extremely uncertain.

Food Stamps:

Food Stamps, a 100% federally-funded program, have long excluded college students from eligibility, with few exceptions. As few as 47,000 students attending college may receive Food Stamps. Recipients who enroll in college stand to lose an average annual food subsidy of $432. (Source: Rosen, 1981.)

Unemployment Insurance:

As of October, 1981, 19 states limited UI payments to otherwise eligible recipients who enrolled in college. Last year, California joined the ranks of these states, making it still more difficult for unemployed citizens in need of retraining or reeducation to attain the schooling they need for a new skill.

Public Housing:

Public housing residents in attendance at college are adversely affected by the provisions of OBRA. OBRA eliminates the earnings disregard for full-time students and the $300 annual deduction for full-time students which previously existed in determining rent payments for assisted housing programs.

Federal Requirements for Treatment of Student Aid for AFDC Grant Determination:

Federal rules for the treatment of student aid in determining eligibility for public assistance are embodied in P.L. 90-575, Sec. 507, 82 Stat. 1063 and 45 CFR Sec. 233.20(a)(4)(ii)(d). These rules have caused considerable confusion in the treatment of student aid as income and assets to welfare recipients. They have resulted in a rash of court cases with mixed results. However, Zwickel, Mudrick and Rosen have documented that the net effect on an AFDC family with a member enrolled in college is likely to be a reduction of benefits.

B. Federal Requirements for Treatment of Student Aid Benefits in Determining AFDC Eligibility.

1. Background

Existing federal rules for the treatment of student aid benefits in determining AFDC eligibility create financial hardships for low income students. They lead to unequal treatment of students with identical financial resources. Despite numerous court cases ruling on the equity of such provisions, court decisions on the whole are a limited response to the problem. Resolving these inequities will require congressional rather than judicial action, because they are rooted in federal statutes. The problems created by these rules fall under three categories, treatment of:

(1) Student financial aid benefits administered by the federal government.

(2) Grant, scholarship and loan assistance from state, institutional or private sources.

(3) Benefits from a combination of sources.

a. Treatment of Student Financial Aid Benefits Administered by the Secretary of Education

The 1968 Higher Education Amendments stipulated that:

> For the purpose of any program assisted under title . . . IV . . . of the Social Security Act (AFDC), no grant or loan to any undergraduate student for educational purposes made or insured under any program administered by the Commissioner of Education shall be considered to be income or resources.[1]

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1. PL 90-575, Sec. 507, 82 Stat. 1063; with creation of the Department of Education in 1980, this provision now refers to programs administered by the Secretary of Education.

This provision in turn has been incorporated by the Department of Health and Human Services (HHS) into regulation for the AFDC program:

> . . . in determining eligibility for (AFDC) and the amount of the assistance payment, the following will be disregarded as income and resources: . . (d) any grant or loan to any undergraduate student for educational purposes made or insured under any programs administered by the Commissioner of Education . . .[2]

While the provision to disregard any grant or loan administered by the Secretary of Education as either "income or resources" seems prima facie self-evident, a number of problems have arisen with its interpretation in practice. First, HEW (now HHS) listed only four programs in 1977 which it considered to be "grant or loan programs administered by the Commissioner of Education": BEOG, SEOG, NDSL and GSL. College Work-Study and SSIG funds were considered either wages (i.e., not a grant or loan in the case of CWS), or not administered by the Commissioner of Eudcation (in the case of SSIG, a federal-state partnership program). Of the work-study program, Zwickel notes:

> HEW has taken the position that work-study is not a "grant" program within the terms of the law, although it recognizes that it has the same underlying objectives as student aid grants and that to disregard one and not the other could be viewed as inequitable. Its position is to provide states at their option, with a different basis for disregarding those monies in AFDC in full, as discussed below. However, two federal courts have held that work-study is a "grant" program and that work-study money is to be treated as exempt.

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2. 45 CFR Sec. 233.20 (a)(4)(ii)(d); refers to Secretary of Education under current Department of Education.

In addition, the State of New York treats work-study monies as exempt . . .[3]

In the case of the SSIG program, a Utah court[4] struck down the Utah state welfare department practice of counting SSIG funds as income, claiming there was substantial involvement of the U.S. Commissioner of Education in administering the program.

Second, student aid funds from programs not covered by this exemption, e.g., state, institutional or private grants or loans, may not be excluded to the same extent as federally administered funds. Thus, low income students may have their student benefits treated differently depending upon the source of the benefit. While such a practice raises a question of equal protection under law, several court decisions have rejected this claim[5].

Third, problems are encountered in the definition of "student." Does this refer to full-time or part-time attendance? Can a graduate of a baccalaureate program return for another undergraduate degree? Can "graduate" students take "undergraduate" courses? Does the exclusion of graduate students constitute a violation of equal protection? These questions have not been satisfactorily answered.

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3. Howard Zwickel, "Treatment of Student Monies in Public Assistance Programs," Clearinghouse Review, June 1980, p. 104.

4. In re Jensen, Clearinghouse No. 24170A.

5. Richman v. Juras, Anthony v. Public Welfare Division, Department of Human Resources, Lumpkin v. Department of Social Services. (Cf. Zwickel for case citations.)

Finally, questions can arise over whether student aid funds are used for "educational purposes." Zwickel comments:

> HEW early stated that the monies are to be totally excluded "without regard as to their use . . ." Thus, in the rare case in which a portion of (these) funds are available and used to meet current needs, states could be precluded from treating such funds as income or a resource in AFDC. We assume that Congress believed that in most cases the grants or loans would be limited under the criteria of the educational programs to the student's educational needs and that there would be no overlap with the purposes for which the AFDC grant is provided, that is to meet current living needs.[6]

Zwickel's comment illuminates the perceptual differences in determining "living costs" and "educational costs" which pervades the welfare and student aid communities. College attendance significantly increases living costs for low income families. These increased living costs are recognized by student aid administrators as a legitimate part of "educational costs." Routinely, they are not so recognized by welfare case workers, whose perception of educational costs are limited to tuition and fees. They frequently do not even consider books to be an "educational cost." This problem is examined in section d. The Penalties of Different Definitions below.

b. Treatment of Grant, Scholarship and Loan Assistance From State, Institutional and Private Sources

HEW, prior to the creation of a separate Department of Education, encouraged states to disregard all non-federal grants, loans or scholarships as either income or resources. An HEW regulation permits states to exclude such benefits

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6. Zwickel, op. cit., p. 105.

"provided(d) that no duplication shall exist between such other assistance and that provided by the public assistance agency."[7] While this represents a liberal policy toward the treatment of student financial aid benefits as "complementary assistance" to welfare payments, the option of employing it is left to the states. States which do not use this option are required to exempt some student aid benefits as income in AFDC: "(L)oans and grants, such as scholarships, obtained and used under conditions that preclude their use for current living costs will not be counted as income."[8] As in the case of federally administered student aid benefits, the regulatory language is unclear regarding the type of benefits and circumstances under which these are to be excluded. This results in a number of problems.

> (I)t is less clear how states are to treat monies that are provided directly to the individual. For example, if the terms of the grant require that it be used only for tuition, fees and other special school expenses, and the money is provided directly to the individuals with no further accounting by the grantor, is it exempt under this provision? Should it be exempt only to the extent the student can prove how he or she spends the funds? Should it matter that the terms of the grant or loan prohibit it from being used for current living costs and that any violations could result in loss of future monies or in other sanctions?[9]

Furthermore, by declining to require non-federal student aid benefits to be exempted as resources, HEW left open to the states the option of counting such aid as available financial

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7. 45 CFR Sec. 233.20 (a)(3)(vii).

8. 45 CFR Sec. 233.20 (a)(3)(iv)(b).

9. Zwickel, op. cit., p. 105.

resources when determining AFDC eligibility, and subsequently reducing the student's AFDC grant.

c. Treatment of Benefits From a Combination of Sources

Some students receive aid from both federal and non-federal sources. In some cases, the total student assistance may exceed "educational costs" in the view of the welfare department. The question then arises whether or not to treat the "excess" as available income or resources in determining public assistance grants. If the "excess" comes from federal sources, then it should be totally disregarded. However, if it comes from state, private or institutional sources, the welfare agency may count it as income or resources. The student's fate hangs on which dollar is counted first.

For example, if a student receives $2,000 for a semester ($800 in BEOG money and $1,200 in a restricted loan for tuition from a nonprofit organization) and has school and school-related expenses of $1,500, there are at least two possible methods of allocating the funds.

"SCHOOL EXPENSES"	METHOD A	METHOD B
$1,500	$1,200 loan	$800 BEOG
	$ 300 BEOG	$700 loan
"LIVING EXPENSES" $500	$ 500 BEOG remains. (Under the (a)(4) exemption, this money should be exempt.)	$500 of the loan remains. (Under the (a)(3) exemption, this amount could be considered available income if all school and school-related expenses have been met.)[10].

10. Ibid., p. 106.

There have been a number of unsuccessful court appeals to overturn state practices using Method B above.[11] In Lumpkin v. Department of Social Services, the U.S. Supreme Court declined to hear an appeal of a New York court decision, thereby upholding that state's treatment of combined resources. The court stated it was reasonable for a state to prioritize student aid benefits in a manner designed to minimize state welfare costs, even if it penalized the student. The New York Court of Appeals further rejected the argument that student aid provided directly to the school, and therefore not available as income, would result in any different determination for the student.

d. The Penalties of Different Definitions for "Educational Cost" and "Living Allowance "

The most serious penalties for AFDC clients attending college result from two critical differences between the welfare and student aid communities in their treatment of AFDC and student aid:

1. Definitions of "educational costs."
2. Definitions of "living costs."

Welfare officials routinely limit their definition of "educational expenses" to tuition and fees (Schorr, Piven and Cloward, Rosen, Chu-Clewell, Benson-Walker and Downey). This limitation has serious consequences for AFDC students, whose grants are frequently reduced proportionately to any

11. See: Richman v. Juras, Tavarez v. Sipprel, Lumpkin.

non-federal student assistance received above the cost of tuition and fees.

By contrast, student aid administrators routinely include the following expenses in determining educational cost:

> tuition, fees, books, supplies, childcare, transportation, personal expenses, tutoring and counselling expenses, clothing, meals, the student's housing costs, medical expenses associated with attending college for ill or disabled students.

These costs are frequently substantial. For example, one Special Services director in Massachusetts estimates that a single head-of-household in school as a full-time student increases her personal costs alone with college attendance by $2,800 over a 32 week period. This estimate is based on the personal services (fast food, babysitting, cleaning, laundry) which the student must purchase, when prior to college enrollment she was able to perform these services for herself. In fact, as shown below, AFDC grant levels are based on the assumption that the parent has ample time to shop for thrifty food and other personal purchases, can subsist exclusively on inexpensive, home-cooked meals, and can perform all of her own personal services. This becomes impossible when the AFDC parent assumes responsibility for pursuing college study.

Some educational opportunity practitioners report open hostility from welfare case workers when asked to discount these comprehensive educational costs. They frequently view the educational cost budgets determined by student aid administrators to be "giveaways" and overly generous.

The facts do not support such a belief. For example, the living allowance for non-residential students in the Pell Grant program has been frozen at $1,100 since 1974. Students in residence at their college may charge their actual living costs. The National Association of Student Financial Aid Administrators (NASFAA) reports that the Pell Grant "commuter allowance," as it is termed, falls $1,200 to $1,600 short of actual room and board costs for non-residential students. In addition to being far below actual costs, the Pell Grant program furtner limits what it will pay for educational costs to half of the student's budget, up to a maximum grant of $1,800. Even the Reagan Administration, which has been less than generous in its budget requests for student assistance, recently acknowledged this perversely low living allowance by calling for an increase to $3,000 in the Pell Grant living allowance for dependent students.

Regardless of the reasons for welfare case worker intrangience in defining educational costs (e.g., racial, sex or class prejudice, misinformation, anti-education bias, unfamiliarity with college attendance and student assistance programs), an aggressive training and cooperation program will be needed to overcome the problem. Without such reform, AFDC parents will continue to have their benefits cut when they endeavor to achieve economic self-sufficiency through a college education. It is important to remember that not only does the parent/student have her grant cut, but her entire family suffers from a reduction in benefits as a result of this

widespread practice.

AFDC students are further penalized by a second, perhaps more serious, inequity. AFDC standards for allowabie living costs are notoriously low. So low, in fact, they lead one to wonder how recipients manage to provide for their families, even when they recieve both AFDC and Food Stamps. Table 1 shows that in 1979 no state provided combined AFDC/Food Stamp benefits above the poverty line ($7,160 for a family of four in 1979). In thirty states these combined benefits totalled no more than 75 percent of poverty. Eleven states offered combined benefits no greater than 60 percent of poverty ($4,308 annual income for a family of four).

TABLE I

CURRENT AFDC AND FOOD STAMP BENEFIT LEVELS FOR A FAMILY OF FOUR, 1979
(poverty level, family of four equals $7,150)

State	AFDC	Food Stamps[1]	Total	As Percent of Poverty Level
Hawaii	$6,552	$1,332	$7,884	96%
Vermont	5,724	816	6,540	91
New York	5,712	816	6,528	91
Michigan	5,640	840	6,480	91
Wisconsin	5,496	888	6,384	89
Washington	5,268	948	6,216	87
Oregon	5,124	996	6,120	85
Minnesota	5,088	1,008	6,096	85
Connecticut	5,100	996	6,096	85
California	5,076	1,008	6,084	85
Massachusetts	4,752	1,104	5,856	82
Iowa	4,740	1,104	5,844	82
Alaska	5,400	1,896	7,296	82
New Jersey	4,488	1,188	5,676	79
Utah	4,488	1,188	5,676	79
North Dakota	4,440	1,200	5,640	79
Nebraska	4,440	1,200	5,640	79
Idaho	4,392	1,212	5,604	78
Pennsylvania	4,320	1,236	5,556	78
Rhode Island	4,308	1,236	5,544	77
New Hampshire	4,152	1,284	5,436	76
South Dakota	4,080	1,308	5,388	75
Illinois	3,996	1,332	5,328	74
Montana	3,972	1,344	5,316	74
Maine	3,768	1,404	5,172	72
District of Columbia	3,768	1,404	5,172	72
Oklahoma	3,708	1,416	5,124	72
Colorado	3,684	1,428	5,112	71
Kansas	3,672	1,428	5,100	71
Wyoming	3,660	1,428	5,088	71
Ohio	3,492	1,488	4,980	70
Delaware	3,444	1,500	4,944	69
Virginia	3,408	1,512	4,920	69
Nevada	3,312	1,536	4,848	68
Indiana	3,300	1,536	4,836	68
Maryland	3,204	1,572	4,776	67
Missouri	3,072	1,608	4,680	65
West Virginia	2,988	1,632	4,620	65
Kentucky	2,820	1,680	4,500	63
New Mexico	2,748	1,704	4,452	62
Arizona	2,544	1,764	4,308	60
North Carolina	2,400	1,812	4,212	59
Florida	2,352	1,824	4,176	58
Arkansas	2,256	1,860	4,116	57
Louisiana	2,064	1,908	3,972	55
Alabama	1,776	2,004	3,780	53
Georgia	1,776	2,004	3,780	53
Tennessee	1,776	2,004	3,780	53
Texas	1,680	2,028	3,708	52
South Carolina	1,488	2,088	3,576	50
Mississippi	1,440	2,100	3,540	49

[1] Food stamp bonus benefits are based on the *Food Stamp Act of 1977* and are the allotment values in effect from January to June 1979. The bonus values also assume the use of the standard deduction ($65 per month in the 48 states and District of Columbia) and no excess shelter deduction.

SOURCE: Prepared by the Department of Health, Education and Welfare. Cited in U.S. House of Representatives, Committee on Ways and Means, *Report together with Dissenting and Additional Dissenting Views to accompany H.R. 4904, Social Welfare Reform Amendments of 1979*, Report 96-451, 96th Cong., 1st Sess., September 20, 1979.

An even more startling indicator of the inadequacy of current public assistance payments is the average monthly Food Stamp benefit per person. This figure in 1975 was $25.06 per person. This amounts to a subsidy of about 28 cents per person per meal (Rosen, 1982).

These allotment levels are established based on a single variable: family composition. They vary based on a Department of Agriculture (USDA) estimate of the cost of a "nutritionally adequate diet" for different family sizes. The Thrifty Food Plan was established by USDA as a national standard of need, or allotment level. It varies a family's food budget based on the number and age of the family members. The Thrifty Food Plan was established by USDA after numerous court suits challenged the Department's prior standard as insufficient to provide a nutritionally adequate diet. However, the Department itself recognizes that even the "liberalized" Thrifty Food Plan represents an inadequate diet:

> The Department recognizes that a number of factors make it difficult . . . to obtain an adequate diet on . . . the Thrifty Food Plan. In fact, fewer than one in ten families spending an . . . equivalent to the cost of the Thrifty Food Plan received 100% of the Recommended Daily Allowances. Less than half received even two-thirds of the Daily Allowances. . . The average food purchaser, without specific nutritional skills and training, would find it difficult to make the food choices which provide an adequate diet on . . . the cost of the plan. (Source: Robert Hill, 1980.)

Again, student aid guidelines for determining living costs are more adequate in meeting actual costs than those used in

public assistance programs. Title IV student aid programs use the Social Security lower living standard, rather than the poverty standard employed in AFDC. However, NASFAA has argued that even the Social Security lower living standard is inadequate. NASFAA recommends that student aid programs employ the moderate lower living standard defined by the Bureau of Labor Statistics.

As a result of the widely varying standards for determining living costs and educational costs employed by the welfare and student aid communities, it is imperative in assuring college access for welfare recipients that the student aid standards prevail. Even these standards require additional adjustment to meet actual, rather than arbitrarily low, educational and living costs.

Lastly, welfare recipients and their families are penalized by the separate consideration given to the student's "budget" and the family's "budget." For such low income families, who as we have seen are already living at the edge of subsistence, any reduction in any grant of any amount will restrict college access for a family member. The practice of counting one set of benefits against another must end if the subsistence survival, let alone college opportunity, of families living in poverty is to be assured.

e. Other Inequities

While AFDC rules are neutral with respect to the level and control of postsecondary institution attended, they do discriminate among (1) commuter and residential schools; (2)

postsecondary programs attended as part of an AFDC-approved "training" program and those not so approved; (3) and institutions in different states.

The living allowance provided by student financial aid administrators for commuting students as part of college costs is likely to be counted as income to the AFDC family. The result will be a dollar-for-dollar reduction in the family's AFDC grant. Local welfare officials will be more inclined to disregard the living allowances for students residing at their college

AFDC- or WIN-approved postsecondary training will make allowances for child care and other costs of college attendance. Even so, payment of childcare costs is rarely available for AFDC recipients. Those attending college without WIN support will find few if any resources available for cnildcare. This problem is compounded by the prevailing practice of local welfare officers of actively discouraging college attendance for AFDC recipients.[12] Finally, rules with respect to the treatment of non-federal student assistance differ from state to state. This results in inequities based solely on where a family resides, and the benefit level provided by tnat state.

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12. Beatriz Chu Clewell, "Barriers to Higher Education for Welfare Recipients," Draft paper, 1982, Washington, D.C.; Alvin Schorr, Project Fair Play, Findings, Case Western Reserve University, 1981; Sylvia Law, "Women, Work, Welfare and the Preservation of Patriarcny," New York University Law School, Decemoer, 1982; Gwen Benson-Walker, a survey of participants in the Motivation to Education for Jobs Program, National Student Educational Fund, Washington, D.C., 1982.

In her examination of AFDC-Pell Grant interactions, and after a telephone survey of welfare practices in seven states, Mudrick concludes:

> (T)he net impact on an AFDC family that has a member enrolled in college is likely to be a reduction in the resources available to support the family, even when the student receives enough student aid to cover all direct and indirect educational expenses.[13]

2. Recommendations

Until federal law provides unequivocal, mandated exemptions of student financial assistance as either income or resources to a poor family, low income students and their families will continue to suffer from a double penalty. First, student aid required to pay the costs of college will be used to reduce the family's AFDC grant. Second, students with identical resources and costs will be treated differently by state welfare offices with widely differing rules. Legislation will be required to remove this double penalty. Extensive litigation has failed to resolve the problems created by vague federal law and conflicting state practices in this area. The Commission should carefully consider the following issues in its efforts to recommend legislation which will resolve the problems created by this difficult area of welfare/student assistance law.

The following recommendations are intended to avoid the duplication of AFDC and student assistance benefits by relying

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13. Nancy Mudrick, "The Interaction of Public Assistance and Student Financial Aid," September, 1980, The Washington Office of the College Board.

on common definitions of "undergraduate student," "educational cost," "living allowance." They further intend to require common definitions of satisfactory academic progress and "independent student" in an effort to assure that AFDC students are adequately pursuing a college degree program which will help lead to economic self-sufficiency.

1. Definition of "undergraduate student" shall be identical to that used for the Pell Grant program for purposes of AFDC grant determinations under Section 484 of the 1980 Higher Education Amendments.

2. All grant, loan, and work/study sources of student financial assistance -- federal, state, institutional, private -- shall be disregarded as either income or resources to the student and his or her family in determining AFDC grant levels by all states, the District of Columbia and the trust territories. A common, and comprehensive, definition of "student financial assistance" should be adopted.

3. The following categories of costs, normally included in educational budgets, shall be considered educational expenses to be paid for by available student aid:

   tuition, fees, books, supplies, clothes and other personal expenses, transportation, meals, the student's housing, childcare, tutorial services, medical expenses associated with attending college for ill or disabled students

4. All forms of student financial assistance received from any source to pay for the costs of attending college, as budgeted by the postsecondary institutions financial aid officer, shall be disregarded as income or resources to the student and to his or her family in determining AFDC grant levels by all states, the District of Columbia and the trust territories.

5. Recipients of all forms of student financial aid from all sources shall not be responsible

for accounting, other record-keeping, verification or fraud and abuse sanctions other than those required by recipients of Title IV student financial assistance under current law.

6. All AFDC assistance shall not be counted as income or student aid in determining federal and non-federal grant, loan or work-study student assistance, except when explicitly provided as a supplement to the family's grant for an identifiable component of educational cost, e.g., transportation or childcare.

The Commission should further consider effective mechanisms to assure cooperation among HHS, ED and state welfare and student assistance agencies in conforming to these requirements. Any provision allowing state option in treatment of any form of student assistance for AFDC grant determination will continue inequitable practices. The memorandum of agreement between the Office of Student Financial Assistance and the Rehabilitive Services Administration of the U.S. Department of Education can serve as a useful model in assuring such inter-agency support. A copy of this agreement is appended.[14] Damons and Associates of Rockville, Maryland is completing an evaluation of the effectiveness of the OSFA/RSA agreement in those states which have adopted it. The Commissioners may wish to review the materials currently available from Damons in applying this experience to the problems of coordinating public assistance and student aid.

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14. For a full discussion of RSA/OSFA cooperation in awarding student aid to disabled students, see David Rosen, No One Should Be Denied: The Effects of Public Assistance on College Opportunity, March 1982, pp. 248-271. NCSFA has a copy of this manuscript in its offices.

C. Other AFDC Recommendations.

1. Reinstitute 18-21 year old dependent eligibility if enrolled in postsecondary education, high school equivalency or training program.

2. Replace work requirements for parents with incentives to enroll in postsecondary education, high school equivalency or training programs.

3. Adjust expense allowances to meet real costs for work, training and education expenses in AFDC grant determination.

4. The definition for undergraduate student in Sec. 484 of the 1980 Higher Education Amendments should be used to identify AFDC and all other public assistance program recipients who enroll in college.

   AFDC students, as well as all other student aid recipients, should pursue a course of study that will be of both material and personal benefit to them. A standard of "satisfactory academic progress" may be employed, as in §484, to help assure this. However, such a standard should not penalize low income students for academic skill deficiencies they may have developed from their prior schooling. At the same time, this standard should acknowledge the importance of pursuing a coherent degree program.

   The satisfactory progress standard should be developed in consultation with both higher education and educational opportunity representatives.

   In applying a satisfactory progress standard which is sensitive to these issues for welfare clients, the Commission will help avoid potential abuse of the proposed college incentives.

5. Eliminate workfare requirements and state options for workfare.

6. Eliminate limits on application of earnings disregard formula (30 and 1/3) for working AFDC recipients enrolled in postsecondary education, high school equivalency or job training.

7. Revise AFDC treatment of all student aid from all sources as recommended in Part I B. above.

8. Target available federal job training resources on AFDC recipients; remove financial disincentives to participate in such job training programs; encourage coordinated education and job training programs at postsecondary institutions for recipients who qualify for admission to college. (Despite numerous incentives for CETA enrollees to participate in college programs as part of coordinated education and work programs (see Rosen and Sunderland 1979), a mere 2.4 percent of all non-summer 1978 CETA participants enrolled in college. (Source: Continuous Longitudinal Manpower Survey, U.S. Department of Labor.)

9. Institute a complete information service to AFDC recipients and prospective recipients regarding available aid, available education and training opportunities, and rights and responsibilities of recipients in the programs. This recommendation has also been forwarded by the National Student Educational Fund (Benson-Walker and Downey, undated).

D. Food Stamps

1. Disregard all student aid from any source as income or resources available to Food Stamp recipients and their families in determining Food Stamp purchase requirements, consistent with recommendations in Part I B. for AFDC.

2. Remove all work requirements for Food Stamp recipients enrolled in postsecondary education.

3. Remove categorical prohibitions against college student eligibility for Food Stamps for the following beneficiaries enrolled in college under the definition of Sec. 484 of the 1980 Higher Education Amendments for eligible students:

   - all heads of household.
   - all Food Stamp beneficiaries who meet the Pell Grant definition for independent student (CFR 690.42).
   - all dependent family members of eligible Food Stamp family units.

4. Assure eligibility for both Food Stamp and student assistance based on financial need.

5. Reinstitute information and outreach services regarding Food Stamp benefits and opportunities for college enrollment to current and prospective Food Stamp beneficiaries.

E. Medicaid

The direct effects of Medicaid policies on college opportunities are impossible to gauge. HHS maintains no data on the number of students or the educational attainment of Medicaid recipients. Since Medicaid eligibility is directly tied to AFDC eligibility, however, those AFDC policies which disqualify recipients for aid simultaneously result in loss of Medicaid benefits in most cases. For example, the roughly 200,000 18-20 year old students eliminated from AFDC support by the 1981 Omnibus Budget Reconciliation Act lost their Medicaid support as well. State Medicaid eligibility and coverage policies duplicate the inequities found in state AFDC rules.[15]

As of 1982, 29 states and the District of Columbia provided Medicaid coverage to "medically needy" individuals. These are people with low incomes and high medical expenses. Some college students who lost their Medicaid coverage through loss of AFDC eligibility may retain it in these states if they have routinely high medical costs. Others with ordinary medical expenses, as well as those not residing in these states, will not retain coverage.

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15. For a complete discussion of Medicaid and its effects on college opportunity, see Rosen, op. cit. pp. 157-176.

The following recommendations will assist in protecting low income postsecondary students from loss of needed health care services.

1. Any low income postsecondary student who, by virtue of student financial aid received to pay for educational costs, loses his or her eligibility for AFDC shall remain eligible for full Medicaid coverage.

2. Postsecondary institutions shall provide either student health care services or student health insurance plans adequate to meet the needs of Title IV student assistance recipients.

   The cost of any student health insurance premium should be included in the calculation of the student's educational expenses when determining student aid awards.

   Statewide or regional group health plans should be developed for smaller colleges incapable of supporting their own health plan.

3. Congress should study current health plans available for low income college students, and enact programs to fill the needs in this area.

F. Public Housing

1. Disregard all student aid from all sources for all educational costs as income or resources available to the low income families supporting family members in postsecondary study and residing in any federally-assisted housing unit.

2. Deduct all child-care costs from rental subsidy determinations for low income parents in federally-assisted housing units who are enrolled in postsecondary education.

3. Reinstate $300 deduction from income in determining rental subsidies for each family member attending a postsecondary institution and residing in federal-assisted housing.

4. Adjust housing costs in computing student budgets to reflect increase in rent requirements in federal-assisted housing programs for family members attending a postsecondary institution.

G. Unemployment Insurance

1. Exempt unemployed workers otherwise eligible for UI benefits from state limitations or prohibitions of their eligibility and benefits levels when enrolled in postsecondary education.

2. Clarify the distinction in "student intern" prohibitions to UI eligibility between students employed in a College Work/Study job which is "an integral part of their studies" (e.g., in a cooperative education program), and that College Work/Study employment which is not so related to their studies. Where postsecondary students are employed in wage labor, with no program educational benefit associated with the work, UI eligibility should apply as it would for any other worker.

3. Remove prohibitions against UI eligibility for student workers employed at the institutions they attend if otherwise eligible, and if not employed in a College Work/Study job integrally related to their education.

H. Other Short Term Recommendations

1. Develop comprehensive information services to recipients and prospective recipients of federal public assistance programs regarding (a) available benefits; (b) available postsecondary educational opportunities; (c) available student financial aid from all sources. These informational requirements shall apply equally to all agencies administering federal public assistance programs: HHS and state and local welfare offices; USDA, state UI and employment development agencies, HUD, ED. The information requirements may be modelled after the Student Consumer Information Amendments to the 1976 Higher Education Amendments (Section 493). The authority and activities of Education Opportunity Centers (Section 417(E) of the 1980 Higher Education Amendments) may serve as a useful model for information and advocacy services. For student financial aid administrators, the existing training authority (Section 486 of the 1980 Higher Education Amendments) may be effectively used, as can the existing Trio training authority (Section 417(F)) for educational opportunity professionals.
   It is important that the training and dissemination activities of the student aid, welfare and educational opportunity communities complement each other, avoid contradicting eacn other, and adequately inform one another about their respective programs, services and benefits. The Commission is also advised to consider the information recommendation prepared by the National Student Educational Fund to improve college opportunities for welfare recipients.

3. A federal commitment of adequate appropriations will be required to make such training authorities and information services effective.

4. Support for Special Programs for Students from Disadvantaged Backgrounds (Trio), especially the Special Services and Educational Opportunity Center programs, will provide additional advocacy, counseling and information and supportive services needed by public assistance recipients to negotiate complex public assistance and student aid rules in their efforts to attend college. The proven effectiveness of these programs warrants an expansion to adequately serve their eligible client population. Current funding allows Trio programs to serve approximately 10% of their eligible clientele.

II. LONG RANGE RECOMMENDATIONS

While the short range recommendations presented above will help alleviate the inequities created by the interaction of public assistance and college opportunity policies, they will not eliminate them. The following discussion and recommendations provide a guide to the development of a comprehensive public assistance and college opportunity policy which will help lead to the achievement of equal educational opportunity, rather than perpetuate the current system of contradictory policies and disincentives to self-improvement. These recommendations of necessity call for a fundamental restructuring of welfare policy in the United States. Such reform is required to eliminate the barriers to self-sufficiency endemic in our current welfare policies. This debate may be outside the charge of the Commission. However, the issues and recommendations presented below must be addressed if these problems are to be ultimately resolved. They are offered, therefore, for the Commission's consideration, and for appropriate referral to further action. Five principles for complementary public assistance and college opportunity policies are discussed below.

A. Financial Resources

Going to college costs money. Not only must tuition and fees be paid, but books, supplies, equipment, transportation,

meals, clothing, health care, child care are all expenses incurred in the process of attending college. For low income citizens, both heads of households and their dependents, these expenses simply cannot be paid for from family resources. Subsistence costs take precedence simply as a matter of survival: rent, food, clothing, utilities, health care. The 24 million Americans living below the poverty line[1] do not have sufficient funds to pay even these subsistence costs. College for them remains an unattainable goal.

Consequently, complementary public assistance and college opportunity policies must provide adequate financial resources to low income individuals for both subsistence expenses and expenses for attendance at the college of choice. Public assistance policy which in any way reduces financial resources available to such citizens upon their enrollment in college makes it financially almost impossible to attend. This assertion is supported by a broad research literature which documents demand for college to be directly related to available financial resources to pay for it. A $100 net increase in the cost of college is accompanied by a 1 percent

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1. Bureau of the Census, U.S. Department of Commerce, Current Population Reports, Population Characteristics: Demographic, Social and Economic Profile of States: Spring, 1976.

to 3 percent decline in enrollment rates of low and moderate income individuals.[2]

1. Recommendation

   -- Provide a federally guaranteed annual income equivalent to at least the federal poverty level to individuals and families, free from categorical distinctions. Such a standard should be adequate to support subsistence needs for food, housing, clothing, utilities, health care.

8. Freedom from Workfare Requirements: Incentives for Employment, Training and Education

Public assistance workfare requirements are based on tne belief that recipients must "earn" their benefits, rationalized by the assertion that such requirements "provide (work) experience and training . . . to assist them to move into regular employment."[3] The reality of workfare differs from

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2. See Gregory Jackson and George Weathersby, "Individual Demand for Higher Education," Journal of Higher Education, Nov./Dec., 1975; Gregory Jackson, Financial Aid and Student Enrollment, Harvard Graduate School of Education, January 1977; Michael McPherson, "The Demand for Higher Education," in David Beneman and Chester Finn, eds., Public Policy and Private Higher Education, Brookings, 1978, pp. 180-182; P. Feldman and S. Hoenack, "Private Demand for Higher Education in the U.S.," The Economics and Financing of Higher Education in the U.S., Joint Economic Committee, 1969; R. Radner and L. Miller, "Demand and Supply in U.S. Higher Education: A Progress Report," American Economic Review, May 1970; F. Sloan, "The Demand for Higher Education: The Case of Medical School Applicants," Journal of Human Resources, Fall 1971, pp. 466-89; R. Spies, The Future of Private Colleges, The Effect of Rising Costs on College Choices, Princeton University, 1973.

3. Community Work Experience Program, 1981 Omnibus Budget Reconciliation Act, PL 97-35, Section 409.

the rationale. The General Accounting Office (GAO) found in a review of one such "workfare demonstration project" that jobs were low-level, unskilled, unsupervised, poorly administered, and offered no opportunities for evaluation, training or transfer to regular employment.[4] Furthermore, the U.S. Civil Rights Commission heard testimony that workfare requirements were used to support low wage farm labor for blacks.[5] The findings of numerous workfare project evaluations confirm that the strategy is punitive in nature, non-productive, and ineffective in reducing welfare costs.[6] Moreover, workfare as a transitional program to unsubsidized employment has been found ineffective (Friedman, et al, and Goodwin). Contrary to the expectations of the Reagan Administration for workfare to reduce public assistance costs, it has been found to produce "no significant reductions in welfare payments" (Friedman, et al; State of California). Additionally, workfare on a large scale could undermine prevailing wage structures. Joe concludes:

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4. GAO, Insights Gained in Workfare Demonstration Projects, July 32, 1981, pp. 4-5.

5. U.S. Civil Rights Commission hearing, Cairo, Illinois, June 10, 1966; Staff Report on Public Assistance in Alabama, updated.

6. Tom Joe, et al., National Opinion Research Center, University of Chicago, The Poor: Profiles of Families in Poverty, March 20, 1981, pp. S-5, 19-21, 57. See: State of California, Third Year and Final Report on the Community Work Experience Program, Employment Development Department, April 1976; James Koppel et al., Final Report: A Study of General Assistance Workfare Programs, National Association of Counties, 1978; Barry Friedman et al., An Evaluation of the Massacnusetts Work Experience Program, Brandeis, 1980; Leonard Goodwin, "The Case Against Work Requirements," Public Welfare, 36, 2, Spring 1978.

> Given what is known about workfare programs from several demonstration projects, and from the existing work requirements of other programs such as AFDC and Food Stamps, the (Reagan) Administration's workfare plan is likely to be an administrative failure -- and financially wasteful . . . Requiring recipients to work in makeshift jobs is not compatible with the work ethic. Instead, workfare can be a punitive measure that can undermine the value of work and thus have an effect opposite what it is intended to achieve. Mandatory work in menial jobs also does not provide job skills to welfare recipients that they can use in market-supported employment, and therefore will not lessen their dependency.[7]

Workfare is founded on a penal system of work-for-no-pay. It serves to deprive low income citizens of opportunities to either pursue higher paying, more productive employment or educational opportunities intended to increase their employability for such positions. Citizens required to submit to workfare programs, who must also care for their children, have little if any time available to pursue an education designed to make them economically self-sufficient. In order to take advantage of available college opportunities, public assistance recipients must be freed from workfare requirements. They must have the freedom to pursue a college education which will help prepare them for productive employment and available job opportunities.

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7. Ibid., pp. 24-25.

1. Recommendations:

   -- Abolish workfare requirements and program options in all federal public assistance programs. No public assistance recipient shall be required to work to earn their entitled benefits.

   -- Reinstitute and strengthen incentives for work, training and education of public assistance recipients.

   -- Target federal employment and training program benefits and services on public assistance recipients.

   -- Provide incentives for coordinated education and work training programs based in postsecondary institutions for public assistance recipients.

   -- Develop appropriate work, training and education program options for public assistance recipients with differing needs, abilities and aspirations.

C. Information

Schorr, Piven and Cloward have documented the need for adequate information about the availability of public assistance. The Student Advisory Committee of the College Scholarship Service and the National Student Educational Fund have documented the need of students and prospective students for information about postsecondary education opportunities and the availability of student financial aid. Benson-Walker and Chu-Clewell have shown the information needs of public assistance recipients who wish to attend college. In the past, information -- or lack of it -- has been used as an administrative tool to deny people benefits to which they are legally entitled. For example, under Mayor John Lindsay in New York City, a memorandum prepared for him by the Budget Bureau proposed "the elimination of seven outreach centers and at least seven of the regular welfare centers through

consolidation . . . in order to . . . build up and maintain the maximum legal backlog between intake and final determination of eligibility."[8] These proposals were indeed enacted, and did result in reduced awareness and demand for welfare benefits.

Both public assistance and college opportunity programs should assure the aggressive dissemination of accurate, complete and timely information regarding available benefits and programs under each to all beneficiaries and prospective participants. Policies which inhibit the flow of such information constitute a barrier to equal educational opportunity.

1. Recommendation

   -- The short-term recommendations for information services presented on pages 15-16 apply here.

D. Simplicity

Much of the need for services, e.g., outreach workers, eligibility technicians, case workers, and the resulting costs, paperwork and excessive bureaucracy of public assistance programs result from their complexity. Public assistance programs are, at bottom, intended to redistribute income as a partial remedy for inequities found in the economic order. That goal may be achieved through a greatly simplified system of cash transer administered, for example, by the IRS. If administrative costs of the eight public assistance programs

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8. New York City Budget Bureau, Recommendations for Savings in the Welfare Budget, March 24, 1969, quoted in Piven, op. cit., p. 161.

reviewed by Rosen[9] are assumed to be 15 percent of total costs, then about $9 billion could be saved by instituting a simple cash transer system. A similarly large amount would be saved by eliminating the need for litigation, counseling, paperwork and a myriad of secondary costs associated with the bewildering complexity of current public assistance programs.

Administrative simplicity is not a new idea. Past proposals for streamlining public assistance payments, however, have used such action as a screen intended to lower cash benefits, e.g., President Nixon's Family Assistance Plan and the income portion of President Carter's Better Jobs and Income Plan. Proposals for administrative simplicity must:

-- assure low income citizens a decent financial standard for subsistence

-- not reproduce the profusion of 50 state and 3,000 local welfare offices, each with their own policies and practices

-- not reproduce the array of nine federal departments and 21 Congressional committees.

This will be a great step not only in enhancing the complementarity of public assistance and college opportunity, but also in reducing inequity, inefficiency and unworkability of the current public assistance system.

Beyond administrative savings, however, the simplification of federal public assistance programs is proposed to eliminate

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9. Rosen, 1982, op. cit. These programs include AFDC, Food Stamps, Medicaid, Public Housing, Social Security, Student Benefits, CETA, Unemployment Insurance, Vocational Rehabilitation.

discrimination among categories of deserving and undeserving low income citizens. Current federal law makes such distinctions, preserving in the process a system which inequitably treats citizens with identical financial resources but different family, health or residence characteristics. However, these proposals for simplifying public assistance will not on their own correct other inequities which occur in the marketplace, in housing, health care and education for example. Still more fundamental reforms outside the scope of this paper will be required to redress these problems.

1. Recommendations

-- The simplification of federal public assistance payments will require the end of categorical distinctions among different types of low income citizens (e.g., elderly, disabled, single parents). A single income-test would be required for eligibility and grant level determination.

-- Programs like AFDC, Food Stamps, assisted housing and SSI would be replaced with a simple cash transfer.

-- Such a transfer payment system might be managed by the Social Security Administration or the IRS, subject to the reporting and verification requirements of all citizens by such systems.

-- Work, training and education incentives should be significantly strengthened to assure the self-sufficiency of recipients wherever possible.

E. Support Services

Until the dream of administrative simplicity is achieved, and in order to meet those needs which will continue to present obstacles to college attendance, a wide range of support services are needed to assist low income citizens maneuver

through the thicket of public assistance programs in their educational pursuits. These services include assistance in applying for student financial aid and for college admission, basic skills instruction, tutoring, counseling, outreach and recruitment, child care, as well as advocacy to assist in the myriad administrative procedures required by the interaction of public assistance and student financial assistance programs. One chief problem is that no one agency or service exists to assure that all the necessary steps proceed as required. Student aid administrators remain responsible for their programs, welfare case workers for theirs. A consensus must be reached among policy makers and practitioners alike as to how this array of needed services can be most effectively provided.

Finally, though outside the scope of this inquiry, one last "service" must be mentioned. The public schools must be strengthened to adequately prepare all students with the talent and desire to attend college. Until the inequities of the elementary and secondard school systems for poor students are corrected, many of these students will never realize their full intellectual, personal and productive potential.

1. Recommendations

   -- Expand appropriations to the Trio program sufficient to meet client need and within the capacity of the educational opportunity community to provide quality services.

   -- Provide incentives to postsecondary institutions to enroll and support low income students. These should be developed in consultation with higher education and educational opportunity representatives.

   -- Strengthen professional training for welfare, student aid and educational opportunity professionals to better serve the needs of low income students created by the interaction of their programs.